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7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10
11 JON J. CORDOVA,

12 Plaintiff,

13 v.

14 CONVERGYS CORPORATION,

15 Defendant.

Case No. C 11-00333 RS

**STIPULATION AND [PROPOSED]
ORDER FOR A HOLD ON CASE-
RELATED DATES AND FOR A INITIAL
CASE MANAGEMENT CONFERENCE**

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Case No. C 11-00333 RS

**STIPULATION AND [PROPOSED] ORDER FOR A HOLD ON CASE-RELATED DATES
AND FOR A INITIAL CASE MANAGEMENT CONFERENCE**

1 WHEREAS the Court has scheduled a June 9, 2011 Initial Case Management
2 Conference, which requires the preparation and filing of a Joint Case Management Statement by
3 June 2, 2011;

4 WHEREAS the parties have other upcoming case-related dates, including for answering
5 the First Amended Complaint, filing of a Second Amended Complaint, and Initial Disclosures;

6 WHEREAS the parties have had informal settlement disclosures, and would like to
7 continue these discussions without having to incur further litigation-related expenses related to
8 these upcoming court and case-related dates;

9
10 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by plaintiff Jon J.
11 Cordova and defendant Convergys Corporation, by and through their respective counsel, that
12 they hereby jointly request that the Court impose a 30-day hold on this case, during which the
13 parties will not be required to file with the Court or serve on each other any case-related
14 documents which would otherwise be required without this hold. The 30-day hold will run from
15 May 26, 2011 through June 26, 2011. Cordova will have until July 7, 2011 to file (a) his
16 amended fraud claims in a Second Amended Complaint, (b) a stipulation authorizing the filing of
17 an amended complaint alleging additional claims with a Second Amended Complaint, or (c) a
18 motion requesting leave to file a Second Amended Complaint alleging additional claims, if any.
19 Convergys shall have until two weeks after the filing of an amended complaint to file a
20 responsive pleading, or until July 21, whichever is later.

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22 The Court shall schedule an Initial Case Management Conference on a date convenient
23 with its calendar on July 21, 2011, or other date available to the Court, assuming the case has not
24 settled and a Request for Dismissal is not submitted to the Court prior to said date. The parties
25 shall submit a Case Management Statement one week prior to the Case Management Conference.
26 The parties shall also mutually agree on a date after June 26 for service of Initial Disclosures,

assuming the case is not resolved in the interim.

IT IS SO STIPULATED.

Dated: May 26, 2011 /s/ Guy Kornblum
 Guy Kornblum
 GUY KORNBLUM & ASSOCIATES
 Counsel for plaintiff Jon J. Cordova

Dated: May 26, 2011 /s/ Thomas M. McInerney
 Thomas M. McInerney
 OGLETREE, DEAKINS, NASH, SMOAK &
 STEWART, P.C.
 Counsel for defendant Convergys Corporation

~~[PROPOSED]~~ ORDER

Based on the request and stipulation of the parties, and for good cause showing, the Court hereby orders that 30-day day hold on litigation outlined in the parties' stipulation while the parties pursue settlement discussions. The Court further orders that a Case Management Conference will be held on July 28, 2011, at 10 a.m. The parties are to file a joint Case Management Statement one week prior. Cordova shall have until July 7, 2011 to file (a) his amended fraud claims in a Second Amended Complaint consistent with the Court's May 9, 2011 order, (b) a stipulation authorizing the filing of an amended complaint alleging additional claims with a Second Amended Complaint, or (c) a motion requesting leave to file a Second Amended Complaint alleging additional claims, if any. Convergys shall have until two weeks after the filing of an amended complaint to file a responsive pleading, or until July 21, whichever is later.

IT IS SO ORDERED.

Dated: 5/26/11



The Honorable Richard Seeborg
 United States District Court for the
 Northern District of California